

**UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Case No.: 3:13-cr-00097-SLG-JDR
JASON JAYAVARMAN,	)	
Defendant.	)	

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**DECLARATION OF COUNSEL**

I, Vikram N. Chaobal, declare under perjury that the following is true:

1. I am the attorney for the defendant Jason Jayavarman in the above-captioned case.
2. Trial in this matter is currently set for October 23, 2013.
3. Pretrial Motions are due by September 12, 2013.
4. In addition to requesting a trial continuance, defendant is requesting additional time to prepare pretrial motions.
5. The purpose of this affidavit is to support the request of defendant to declare this case unusual and complex, and to provide a limited exemption from the speedy trial requirements of 18 U.S.C § 3161.
6. This case is unusual and complex within the meaning of 18 U.S.C § 3161(h)(7) for the following reasons:
  - a. The defendant in this case is charged with 3 counts of Sexual Exploitation of a Child, Engaging in Illicit Sexual Conduct in Foreign Places and 2 counts of Travel with Intent to Engage in Illicit Sexual Conduct. The alleged crimes are alleged to have occurred over a four year period. The indictment alleges multiple acts spanning throughout this four year period and taking place in foreign commerce.
  - b. The discovery process has just begun. Discovery consists of over 50 video recordings, numerous computer memory cards, numerous audio recordings and voluminous paper discovery. As a majority of the

discovery is electronic and defendant has limited access to computers located at the Anchorage Jail Complex, it will be a time consuming project to review each recording with defendant.

- c. Under these circumstances, I do not reasonably believe that I can fulfill my Sixth Amendment obligation to my client without a continuance of the trial date and the deadlines for pretrial motions.
- d. For all these reasons, the above party asks the court to vacate the current trial date, to declare the matter unusual and complex, and reset the trial date to a time convenient to the court and counsel six (6) to nine (9) months from now.
- e. I have conferred with United States Attorney Audrey Renschen, and she does not oppose this Motion to have the case declared complex and to continue the pretrial motions date and trial date.

Dated this 5<sup>th</sup> day of September, 2013, at Anchorage, Alaska.

/s/ Vikram N. Chaobal

VIKRAM N. CHAOBAL, AKBAR#: 0305011

Attorney for Jason Jayavarman

310 K Street, Ste 200

Anchorage, AK 99501

Phone: (907)947-5056

Fax: (907)264-6602

Email: [vchaobal@gmail.com](mailto:vchaobal@gmail.com)

CERTIFICATE OF SERVICE

I hereby certify that on the 5<sup>th</sup> day of September, 2013 a true and correct copy of the foregoing was served electronically to:

Audrey Renschen

[audrey.renschen@usdoj.gov](mailto:audrey.renschen@usdoj.gov)

Ravi Sinha

/s/ Vikram N. Chaobal

Law Office of Vikram N. Chaobal